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May 19, 1987

BY FEDERAL EXPRESS

Mr. Leon M. Oberdick  
Regional Water Quality Manager  
Pennsylvania Department of  
Environmental Resources  
Bureau of Water Quality Management  
One Ararat Boulevard  
Harrisburg, Pennsylvania 17110

WATER QUALITY MANAGEMENT  
MAY 21 1987  
HARRISBURG REGION

Re: PA 0082384: Application of Keystone  
Sanitation Company for Issuance of  
a National Pollutant Discharge Elimination  
System (NPDES) Permit (17 Pa. Bull.  
1100, March 14, 1987)

Dear Mr. Oberdick:

Citizens Urging Rescue of the Environment (Citizens) respectfully requests that the Department of Environmental Resources (Department) reopen the administrative record in the above referenced matter to admit a May 13, 1987 laboratory analysis of the water of the receiving stream (attached) and accompanying comment. The May 13, 1987 analysis was performed by a Department and EPA certified analytical laboratory, Skelly and Loy. The results, infra, establish the existence of unexpected and extremely high levels of heavy metals and phenol in the receiving stream's water. This new evidence firmly discredits the technical basis on which Keystone's NPDES application was filed, and thereby undermines the foundation on which the Department based its preliminary determination.

The receiving stream, an unnamed tributary of the South Branch of Conewago Creek, flows directly out from the existing Keystone Sanitary landfill property. Throughout the spring of 1987, local residents noticed a severe degradation of the receiving stream's water. A sheet of discolored foam was seen covering the stream's surface, gathering in billows about fallen logs and trailing branches. A "waxy" substance collected on the stream bank, and a

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Test results of  
unnamed stream  
reported to us by  
Skelly + Loy Lab.  
a certified E.P.A.  
laboratory.

black material was observed floating in the water and snagging on stones and projections.

Compelled by local residents' health and safety concerns, Citizens hired Skelly and Loy to draw samples of the receiving stream's water for analysis. On April 21, 1987, Mr. Matthew Hess, a Skelly and Loy technician, drew a water sample from the receiving stream in the presence of Mr. Lewis Hilliard, Township Supervisor for Union Township, and local residents.

On April 23, 1987, Mr. Calvin Kirby, a Department investigator, also drew a sample from the same location in the receiving stream where the Skelly and Loy sample had been drawn. Citizens understands that Mr. Kirby's sample will be analyzed by the Department, and that results from that analysis will be published when complete.

On May 13, 1987, Skelly and Loy released the results of its analysis. Much to local residents' dismay, the following excessive metals and phenol were detected:

Substance	Concentration	Unit
Silver, Total	.04	mg/l 40 ppb
Arsenic, Total	.32	mg/l 320 ppb
Beryllium, Total	2.1	mg/l 2100 ppb
Chromium, Total	.20	mg/l 200 ppb
Copper, Total	.38	mg/l 380 ppb
Mercury, Total	.0031	mg/l 3.1
Nickel, Total	.46	mg/l 460
Lead, Total	.29	mg/l 290
Phenol, Distilled	.05	mg/l 50
Antimony, Total	.5	mg/l 500
Selenium, Total	.052	mg/l 52
Zinc, Total	1.9	mg/l 1900

Benzeno-Hydrocarbon  
Binds metals together

The reported levels of five metals (arsenic, chromium, copper, nickel, and lead) and phenol far exceed the specific water quality criteria set forth in Pennsylvania's Water Quality Standards. See 25 Pennsylvania Code § 93.7, Table 3. Detected levels of many metals (and of beryllium in particular) exceed toxicity levels for fish and other aquatic life. Reported levels of arsenic, chromium, mercury, lead,

Copper + zinc Combined to - gether  
causes a very serious chemical reaction.

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